

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

MINING PROJECT WIND DOWN HOLDINGS,  
INC. (f/k/a Compute North Holdings, Inc.), *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 22-90273 (MI)

(Jointly Administered)

**CERTIFICATE OF NO OBJECTION WITH RESPECT TO THE  
PLAN ADMINISTRATOR'S OBJECTION TO CLAIM NO. 10121  
ASSERTED BY COMPASS MINING, INC.**

[Related Docket No. 1345]

Pursuant to Section Q of the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* (the “Complex Case Procedures”), the undersigned counsel for Tribolet Advisors LLC, as Plan Administrator (“Plan Administrator”) in the above-captioned bankruptcy cases, certifies as follows:

1. On November 2, 2023, the Plan Administrator filed the *Plan Administrator's*

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<sup>1</sup> On September 28, 2023, the Court entered the *Final Decree Closing Certain Cases and Amending Caption of Remaining Cases* [Docket No. 1287], closing the chapter 11 cases of the following sixteen entities: Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The chapter 11 cases of the remaining three Reorganized Debtors: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); and Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551), shall remain open and jointly administered under the above caption. The Reorganized Debtors' service address for the purposes of these chapter 11 cases is 2305A Elmen Street, Houston, TX 77019.

*Objection to Claim No. 10121 Asserted by Compass Mining, Inc. (the “Claim Objection”).*<sup>2</sup>

2. The deadline for parties to file a response to the relief requested in the Claim Objection was December 7, 2023.<sup>3</sup> No responses have been filed or otherwise received, either formally or informally, by the Plan Administrator, and the deadline for responding has passed.

3. The Plan Administrator requests that the Court sustain the Claim Objection and enter the attached proposed form of order at its earliest convenience.

*[Remainder of Page Intentionally Left Blank]*

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<sup>2</sup> Docket No. 1345.

<sup>3</sup> Per the Certificate of Service appended to the Claim Objection, service was effectuated on November 2, 2023 by First Class Mail and electronic mail to the affected claimant. Pursuant to Federal Rule of Bankruptcy Procedure 9006(f), the Plan Administrator added three days to the prescribed period under Federal Rule of Bankruptcy Procedure 9006(a) for claimant to respond to the Claim Objection.

Dated: December 15, 2023

Respectfully submitted,

/s/ Charles R. Gibbs

Charles R. Gibbs

Texas State Bar No. 7846300

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– and –

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*Counsel to the Mining Project Wind Down  
Holdings, Inc. Litigation Trust and the Plan  
Administrator*

**Certificate of Service**

I certify that on December 15, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

*/s/ Charles R. Gibbs*

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Charles R. Gibbs